

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Reply Memorandum of Law in Support of the Motion to Exclude the Opinions and Testimony of Defendants' Gynecology-Oncology Experts Dr. Cheryl Saenz and Dr. Kevin Holcomb.

3. Attached hereto as Exhibit 1 is a true and correct copy of Brewster, W., *Epidemiology of Commonly Used Statistical Terms and Analysis of Clinical Studies*, Clinical Gynecology Oncology (9th ed. 2017).

4. Attached hereto as Exhibit 2 is a true and correct copy of Gertig et al., *Prospective Study of Talc Use and Ovarian Cancer*, 92 J. Nat'l Cancer Inst. 249 (2000) .

5. Attached hereto as Exhibit 3 is a true and correct copy of Amrhein, Greenland & McShane, *Retire Statistical Significance*, 567 Nature 305 (2019).

6. Attached hereto as Exhibit 4 is a true and correct copy of Roberts et al., *Management of a malignant pleural effusion: British Thoracic Society pleural disease guideline 2010*, Thorax, 65:ii32-ii40 (2010).

7. Attached hereto as Exhibit 5 is a true and correct copy of the Deposition of Michael Birrer, M.D., Ph.D. taken on March 29, 2019.

8. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell
P. Leigh O'Dell

Dated: June 17, 2019